

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<hr/> <b>THIS DOCUMENT RELATES TO:</b>  <i>Diane Kropf, et al. v. Ethicon, Inc., et al.</i> <b>Case No. 2:12-cv-01202</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO LIMIT THE  
CASE-SPECIFIC OPINIONS AND TESTIMONY OF RICARDO GONZALEZ, M.D.**

Plaintiffs oppose Defendants' Motion to Limit the Case-Specific Opinions and Testimony of Ricardo Gonzalez, M.D. Dr. Gonzalez performed a thorough and complete differential diagnosis in coming to his conclusions that Mrs. Kropf's pelvic injuries were caused by the defective TVT-O and Prolift devices. Plaintiffs incorporate their Memorandum in Support of Plaintiffs' Opposition to Defendants' Motion to Limit the Case-Specific Opinions and Testimony of Ricardo Gonzalez, M.D. and also the following exhibits:

<b>Exhibit</b>	<b>Description</b>
A	Plaintiffs' Designation and Disclosure of Case-Specific Expert Witnesses
B	<i>Curriculum Vitae</i> of Ricardo R. Gonzalez, M.D.
C	Case-Specific Expert Report of Ricardo R. Gonzalez, M.D.

WHEREFORE, for these reasons and for those more fully set forth in Plaintiffs' supporting memorandum of law, Plaintiffs respectfully request that this Court enter an order

denying Defendants' Motion to Limit the Case-Specific Opinions and Testimony of Ricardo Gonzalez, M.D.

Respectfully submitted,

**KLINE & SPECTER, PC**



Dated: May 24, 2019

BY:

---

Lee B. Balefsky, Esquire/25231  
Christine V. Clarke, Esquire/ 314407  
1525 Locust Street, 19th Floor  
Philadelphia, PA 19102  
(215) 772-1000  
Lee.Balesky@klinespecter.com  
Christine.Clarke@klinespecter.com  
*Attorneys for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
<b>THIS DOCUMENT RELATES TO:</b>  <i>Diane Kropf, et al. v. Ethicon, Inc., et al.</i>	<b>Case No. 2:12-cv-01202</b>

**CERTIFICATE OF SERVICE**

I, Lee B. Balefsky, Esq., certify that on May 24, 2019, I electronically filed Plaintiffs' Opposition to Defendants' Motion to Limit the Case-Specific Opinions and Testimony of Ricardo Gonzalez, M.D. and Memorandum with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

Respectfully submitted,

**KLINE & SPECTER, PC**



By: \_\_\_\_\_

LEE B. BALEFSKY, ESQUIRE  
CHRISTINE V. CLARKE, ESQUIRE

Dated: May 24, 2019

*Attorneys for Plaintiffs*